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Attorneys for Defendants
CITY AND COUNTY OF SAN FRANCISCO, et al.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

JANET DEAN, individually, as successor
to PAUL DEAN, and as Guardian Ad
Litem for MARETA DEAN, a minor, and
DARYL DEAN, a minor, SARA BECK,
individually as Guardian Ad Litem for
MATTHEW DEAN, a minor,

Plaintiffs,

vs.

CITY AND COUNTY OF SAN
FRANCISCO, SAN FRANCISCO
POLICE CHIEF HEATHER FONG, SAN
FRANCISCO POLICE OFFICER
DANNY MAY, DOES 1-50,

Defendants.

Case No. C 05-1876 EDL

**STIPULATION AND [PROPOSED]
ORDER CONTINUING CASE
MANAGEMENT CONFERENCE**

Current CMC Date: September 6, 2005
Time: 3:00 pm
Place: Crtrm. E

The case management conference in this case is currently scheduled for September 6, 2005.
The defendants hereby request that the court continue the above case management conference for
approximately 30 days. The plaintiff has no objection to this request. The reason for this request is
as follows:

Through informal discussions with plaintiff's counsel, Deputy City Attorney Evan H. Ackiron was aware that plaintiff was considering filing this action prior its being filed, and was also aware that the action had been filed, but not served, in May 2005. However, until yesterday, no one at the Office of the City Attorney was aware that any defendants in this action had been served with the summons and complaint. As a consequence, no answers have been filed, no initial disclosures have been made, counsel for the parties have not met and conferred regarding any case management issues, and no Case Management Conference Statement has been prepared. Accordingly, defendants request that the conference be continued for approximately 30 days, so these pre-conference events can be taken care of.

DATED: August 31, 2005

DENNIS J. HERRERA
City Attorney
JOANNE HOEPER
Chief Trial Deputy

By: 

EVAN H. ACKIRON
Deputy City Attorney
Attorneys for Defendants

SO STIPULATED

Dated:

Law Offices of Matthew W. Kumin

By: _____

MATTHEW W. KUMIN

Attorneys for Plaintiff

IT IS HEREBY ORDERED THAT

The case management conference in this case is continued to _____ at 3:00 p.m.

1 Through informal discussions with plaintiff's counsel, Deputy City Attorney Evan H. Ackiron
2 was aware that plaintiff was considering filing this action prior its being filed, and was also aware
3 that the action had been filed, but not served, in May 2005. However, until yesterday, no one at the
4 Office of the City Attorney was aware that any defendants in this action had been served with the
5 summons and complaint. As a consequence, no answers have been filed, no initial disclosures have
6 been made, counsel for the parties have not met and conferred regarding any case management issues,
7 and no Case Management Conference Statement has been prepared. Accordingly, defendants request
8 that the conference be continued for approximately 30 days, so these pre-conference events can be
9 taken care of.

10 DATED: August 31, 2005

DENNIS J. HERRERA
City Attorney
JOANNE HOEPER
Chief Trial Deputy

11
12
13
14 By: _____
15 EVAN H. ACKIRON
16 Deputy City Attorney
Attorneys for Defendants

17 SO STIPULATED

18 Dated: 8-31-05

19
20 Law Offices of Matthew W. Kumin

21 By: 
22 MATTHEW W. KUMIN

23 Attorneys for Plaintiff

24
25 IT IS HEREBY ORDERED THAT

26 The case management conference in this case is continued to October 11, 2005 at 10:00 a.m.
27 at 3:00 p.m.

28
STIP. RE: CMC
CASE NO. C 05-1876

1 The last day for the parties to meet and confer regarding initial disclosures, early settlement,
2 ADR process selection and discovery plan, and for the parties to file their ADR certification shall be
3 21 days prior to the case management conference

4 The last day for the parties to complete their initial disclosures and file their joint case
5 management statement shall be 7 days prior to the case management conference

6 DATED: September 1, 2005

